

Edna Igartua

Plaintiff

FILED
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U.S. DISTRICT COURT E.D.N.Y.

OCT 28 2009

P.M.
TIME A.M.

09-cv-3287

Index No. 1:09-cv-03287

complaint

— against —

Elmhurst Hospital D-11 Psychiatric
Ward

To U.S. District Court, Eastern District of New York
(Brooklyn)

The complaint of the ~~state~~ plaintiff,
Edna Igartua, respectfully shows and alleges as
follows:

1. The plaintiff herein, Edna Igartua,
at 2805 Snyder Ave, Brooklyn New York.

2. The defendant herein Elmhurst
Hospital has a principal place of business at
. Defendant is engaged
in the Business of health care of mental & medical
Care.

3. Plaintiff Ms. Igartua desired to
have a hygienic, safe and reliable service from
Elmhurst Hospital.

4. Defendant had wrongfully disputed
with the Plaintiff with negative intention to
to intend my delivery be displeasable.

When the situation had worsen, where,

Unhygienic, unsafe, and dangerous ~~to~~ to Plaintiff's child and her life.

5. Defendant misdirected Plaintiff purposely into the psychiatric ward, of D-11 due to the Dept. of corrections Black Book listings.

6. Defendant purposely ignored the advise and request of the legal Aid, Prisoners Rights association of placing the Plaintiff in the proper department of delivery.

7. When Plaintiff's prenatal doctor from Rikers Island, of Rose M. Singer Center request safe gardening me and more so Plaintiff's child. Due to the use of abuse and violence, from the Dept. of corrections Defendant ignored.

8. When Plaintiff Request proper mental health treatment, having to go through emotional distress due to the abuse Plaintiff was rejected, to receive treatment. Even when the situation had worsen. Where were evidence shown several times.

9. Defendant's employee Ms. Winston did not react on time having full knowledge of Plaintiff's Labor was in process.

10. Ms Winston, the Nurse of D-11 harassing me while in labor provoking me into a fight. Making a statement of "That's good for you, You want to keep fucking around Ha!

11. Ms Winston intentionally took her time to call for assistance. while Plaintiff was in labor.

12. Plaintiff delivered her son as the Defendant Ms. Winston watched the Plaintiff's son being born but the floor head first.

13. Ms Winston smeared the infant with the blood over the floor Right Before picking up the child.

14. Emotionally and mentally the Plaintiff suffered. Pain the malpractice

15. when plaintiff showered after the delivery plaintiff had ankle bracelet on showering.

16. when the day of discharge of the Plaintiff. the Defendants staff member had taken her son without warning

Wherefore, plaintiff demand judgment against defendants in the sum of \$1,000,000.00 plus interest. cost and disbursement together with any other relief the court finds to be just and proper.

Dated. October 5 2009.

Edna Igantua
Edna Igantua
Plaintiff

2805 Snyder Ave
Brooklyn NY 11224
718) 469-1217

Verification

Edna Igarua, being duly sworn, deposes and says:

I Am plaintiff in the above - entitled action. I have read the foregoing complaint and know the contents thereof. The same are true to my knowledge, except as to matters therein stated to be alleged on information and belief and as to those matters I believe them to be true.

Edna Igarua *Edna Igarua*
Edna Igarua Edna Igarua
Plaintiff.

Sworn to before me this
date: October 6, 2009

Beatrice Polizois

Notary Public

BEATRICE POLIZOIS
NOTARY PUBLIC, State of New York
No. 01PO6197123
Qualified in Nassau County
My Commission Expires November 24, 2012